

Message

From: Butler, Tristan [Butler.Tristan@epa.gov]
Sent: 12/1/2020 3:22:18 PM
To: Schechter, Kathryn [Schechter.Kathryn@epa.gov]
Subject: RE: PFAS Rule

I am still looking through the document. I will let you know if they say anything more specific. Thanks for your clarifications!

From: Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Sent: Tuesday, December 1, 2020 10:20 AM
To: Butler, Tristan <Butler.Tristan@epa.gov>
Cc: Williamson, Tracy <Williamson.Tracy@epa.gov>
Subject: RE: PFAS Rule

Yes, the R include fluorine. This is why we have the structural representation in the latter section. They were supposed to include what R represents – we did in the scope document. Did they forget to include it in this doc?

Kathy

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From: Butler, Tristan <Butler.Tristan@epa.gov>
Sent: Tuesday, December 01, 2020 10:17 AM
To: Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Cc: Williamson, Tracy <Williamson.Tracy@epa.gov>
Subject: PFAS Rule

Hey Kathy,

Here is the definition of PFAS according to the rule:

“For the purposes of this proposed action, the structural definition of PFAS includes per- and polyfluorinated substances that structurally contain the unit $R-(CF_2)-C(F)(R')R''$. Both the CF_2 and CF moieties are saturated carbons and none of the R groups (R, R' or R'') can be hydrogen.”

I just wanted to double check that this is correct. Does an “R” group be anything except hydrogen (i.e. including fluorine)? If so, it might be worth stating explicitly and describing the generic structural unit in a sentence or two.

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